SWIDLER BERLIN LLP

The Washington Harbour

3000 K Street, N.W., Suite 300

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Jonathan P. Guy (Bar No. JG 2634)

Roger Frankel

Matthew W. Cheney

Attorneys for Sanders Lead Co., Inc.

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

•

DELPHI CORPORATION, et al., : Case No. 05-44481 (RDD)

Debtors. : (Jointly Administered)

NOTICE OF RECLAMATION DEMAND

Chapter 11

PLEASE TAKE NOTICE that pursuant to 11 U.S.C. § 546(c) and Section 2-702 of the Uniform Commercial Code, and in accordance with the Reclamation Order [Doc. No. 230] signed on October 13, 2005, the reclamation demand attached hereto as Exhibit A was served on behalf of Sanders Lead Co., Inc. on the Debtors and their counsel on October 18, 2005.

SWIDLER BERLIN LLP

Dated: October 18, 2005

Washington, DC

By: /S/ Jonathan P. Guy

Jonathan P. Guy (JG 2634)

Roger Frankel

Matthew W. Cheney
The Washington Harbour

3000 K Street, N.W., Suite 300

Washington, DC 20007

Telephone: (202) 424-7500

Facsimile: (202) 424-7645

Attorneys for Sanders Lead Co., Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of October, 2005, I caused a true and correct copy of the foregoing Notice of Reclamation Demand to be served via first class mail, postage prepaid, on the following:

John William Butler, Jr., Esquire
John K. Lyons, Esquire
Ron E. Meisler, Esquire
Allison Verderber Herriott, Esquire
Skadden, Arps, Slate, Meagher & Flom LLP
333 West Wacker Drive, Suite 2100
Chicago, IL 60606
Counsel to the Debtors

Kayalyn A. Marafioti, Esquire Thomas J. Matz, Esquire Skadden, Arps, Slate, Meagher & Flom LLP Four Times Square New York, NY 10036 Counsel to the Debtors

Alicia M. Leonhard, Esquire Office of the United States Trustee 33 Whitehall Street, Suite 2100 New York, NY 10004

/S/ Debra O. Fullem
Debra O. Fullem, Senior Legal Assistant
Swidler Berlin LLP

EXHIBIT A

RECLAMATION DEMAND OF SANDERS LEAD CO., INC.

SWIDLER BERLING

Matthew W. Cheney Phone 202.295.8432 Fax 202.424.7643 mwcheney@swidlaw.com The Washington Harbour 3000 K Street, N.W., Suite 300 Washington, D.C. 20007-5116 Phone 202.424.7500 Fax 202.424.7647 www.swidlaw.com

BY FACSIMILE AND FEDERAL EXPRESS

October 18, 2005

Robert S. Miller, Jr., Chairman and CEO Delphi Corporation and Its Affiliates North American Headquarters 5725 Delphi Drive Troy, MI 48098-2815 Ph: 248-813-2000

Fax: 248-813-2670

John D. Sheehan, Vice President Delphi Automotive Systems 5725 Delphi Drive Troy, MI 48098-2815 Ph: 248-813-2000

Fax: 248-813-2670

Re:

Notice of Demand for Reclamation

In re Delphi Corp., et al., Case No. 05-44481

Dear Sirs:

We represent Sanders Lead Co., Inc. ("Sanders") with respect to shipments of goods, specifically refined lead alloy, to Delphi Corporation and its debtor-affiliates and subsidiaries in the above-captioned jointly administered bankruptcy proceedings, including, without limitation, Delphi Automotive Systems (collectively, "Delphi"), at Fitzgerald, Georgia, for the period of September 28, 2005 through October 7, 2005.

Pursuant to 11 U.S.C. § 546(c) and Section 2-702 of the Uniform Commercial Code, as applicable in each jurisdiction, and in accordance with the Reclamation Order [Doc. No. 230] signed on October 13, 2005 by the Bankruptcy Court, Sanders makes formal demand on Delphi for the return of goods supplied by Sanders to Delphi for which proper payment has not been made to Sanders by Delphi. The goods that Sanders demands that Delphi return are identified on the attached schedule and invoices.

Please assemble these goods at the Fitzgerald plant and Sanders will reclaim the goods at that location. Please contact Roy Bray at 334-566-1563 to arrange for the immediate return of the goods. In the interim, please inventory and segregate the goods and provide us with written confirmation that the goods are on your premises.

Sanders expressly reserves all of its rights, powers, remedies, claims and defenses now or hereafter existing at law, in equity or by statute. The exercise or non-exercise of any such right, power, remedy, claim or defense is not a waiver of the right to exercise, and will not preclude the

05-44481-rdd Doc 371 Filed 10/18/05 Entered 10/19/05 14:41:26 Main Document $$\operatorname{\textsc{Pg}}$5 of 13$$

Robert S. Miller, Jr.
John D. Sheehan
October 18, 2005

Page 2

simultaneous or later exercise by Sanders of, any or all such rights, powers, remedies, claims or defenses.

I appreciate your cooperation. If there are any questions, do not hesitate to contact me.

Very truly yours,

Matshew W. Cheney

Matthew W. Cheney

Enclosures

cc: Via Facsimile and Federal Express with enclosures:

John Wm. Butler, Jr., Esquire John K. Lyons, Esquire Allison Verderber Herriott, Esquire Skadden, Arps, Slate, Meagher and Flom LLP Suite 2100 333 West Wacker Drive Chicago, IL 60606

Ph: 312-407-0700 Fax: 312-407-0411

Roger Frankel, Esquire N. Kenneth Campbell (via facsimile) Roy Bray (via facsimile)

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GA 3175

DELPHI ENERGY

FITZGERALD

TOTAL INVOICE

342 PERRY HOUSE RD

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PURCHASE ORDER NO.	TYPE	TERMS	TF	RUCK NO.	PPD OR CO
FS98-002	HSS	CONVERS		53549	HPD
QUANTITY	<u> </u>	DESCRIPTION		UNIT PRICE	AMOUNT
41,215 4,265	17 EMPTY CON	OT 433-9595; 700	PI6S 3743	. 1637	6746.90
		RECEIVED BY		Please Remit SANDERS LE P.O. DRAWER TROY, ALABA	AD CO., INC.



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TO

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DELPHI ENERGY

342 PERRY HOUSE RD

FITZGERALD

GA 31750

| Scale Ticket# 48868

SHIPPED

TO

DELPHI ENERGY

342 PERRY HOUSE RD

FITZGERALD GA 3175

PURCHASE ORDER NO.	TYPE	TERMS	TRUCK NO.	PPD OR CC
FS98-002	HSS	CONVERS	53584	FPD
QUANTITY		DESCRIPTION	UNIT PRICE	AMOUNT
44,760	9595 ANTIMONI 22 BUNDLES LU 18733	ALDO BRS	FIGS . 1637	7327.21
		RECEIVED BY	Please Remi SANDERS LE P.O. DRAWER TROY, ALABA	AD CO., INC.
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DELPHI ENERGY 342 PERRY HOUSE RD FITZGERALD GA 31750

TYPE	TERMS	TRUCK NO.	PPD or CC
HSS	CONVERS	53587	PPD
	DESCRIPTION	UNIT PRICE	AMOUNT
TARE 9 BUNDLES LC 13 BUNDLES LC	OT 412-9595 OT 433-9595	. 1637	7449.17
	RECEIVED BY	SANDERS LE P.O. DRAWER	AD CO., INC.
	9595 ANTIMONI TARE 9 BUNDLES LO 13 BUNDLES LO 22 BUNDLES TO	DESCRIPTION 9595 ANTIMONIAL LEAD TARE 9 BUNDLES LOT 412-9595 13 BUNDLES LOT 433-9595 22 BUNDLES TOTAL; 769 PIGS 18716 RECEIVED BY	DESCRIPTION DESCRIPTION UNIT PRICE 9595 ANTIMONIAL LEAD TARE 9 BUNDLES LOT 412-9595 13 BUNDLES LOT 433-9595 22 BUNDLES TOTAL; 769 PIGS 18716 Please Remit SANDERS LE P.O. DRAWER

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342 PERRY HOUSE RD GA 31750-

DELPHI ENERGY 342 PERRY HOUSE RD

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FITZGERALD

REMITTANCE ADVISED

GA 3175 FITZGERALD

Company of Company	TYPE	TERMS	TRUCK NO.	PPD on CC
PURCHASE ORDER NO. FS98-002	HSS	CONVERS	53500	EPD
QUANTITY		DESCRIPTION	UNIT PRICE	AMOUNT
51,140	18701	ITAL LEAD OT 412-9595; 875	.1637 PIGS	8371.62
		RECEIVED BY	P.O. DRAWE	EAD CO., INC.

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FITZGERALD

GA 31750

\$7,432.80

PURCHASE ORDER NO.	TYPE	TERMS	TF	RUCK NO.	PPD on CC
F\$98-002	HSS	CONVERS		53523	r PD
QUANTITY		DESCRIPTION		UNIT PRICE	AMOUNT
45, 405 935	9595 ANTIMON TARE 23 BUNDLES LO 8 EMPTY CONT	OT 412-9595; 805 F	PIGS	. 1637	7432, 80
		RECEIVED BY		Please Remit SANDERS LEA P.O. DRAWER TROY, ALABA	AD CO., INC.

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342 PERRY HOUSE RD

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GA 31750

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342 PERRY HOUSE RD

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PURCHASE ORDER NO.	TYPE	TERMS	TRI	JCK NO.	PPD or CC
FS98-002	HSS	CONVERS		53780	epp
QUANTITY	<u></u>	DESCRIPTION		UNIT PRICE	AMOUNT
46,595 1,185	9595 ANTIMONI TARE 23 BUNDLES LO 10 EMPTY CONT	OT 412-9595; 805 PI	GS	. 1637	7 627. 60
			Please Remit To: SANDERS LEAD CO., INC. P.O. DRAWER 707 TROY, ALABAMA 36081-0707		
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DELPHI ENERGY

342 PERRY HOUSE RD

SOLD TO

FITZGERALD:

GA 31750

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SHIPPED

TO DELPHI ENERGY

342 PERRY HOUSE RD

GA 31750 FITZGERALD

TVDE	TERMS	TRUCK NO.	PPD OR CC	
HSS	CONVERS	53523	FPD	
<u> </u>	DESCRIPTION	UNIT PRICE	AMOUNT	
TARE 12 EMPTY CONT	OT 433-9595; /70 PI MAINERS 187	GS	7482.73	
	SANDERS LE	Please Remit To: SANDERS LEAD CO., INC. P.O. DRAWER 707 TROY, ALABAMA 36081-0707		
	9595 ANTIMONI TARE 22 BUNDLES LO 12 EMPTY CON	HSS CONVERS DESCRIPTION 9595 ANTIMONIAL LEAD TARE 22 BUNDLES LOT 433-9595; 770 PI	HSS CONVERS 53523 DESCRIPTION UNIT PRICE 9595 ANTIMONIAL LEAD TARE 22 BUNDLES LOT 433-9595; 770 PIGS 12 EMPTY CONTAINERS 18756 RECEIVED BY Please Remissanders LEAD SANDERS LE P.O. DRAWER PROV. ALARA	